

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)

v.)

SAMANTHA BRUCATO-LANSDALE,)

Defendant.)

Criminal No. 1:21-mj-175

STIPULATION

The United States, through undersigned counsel, and the defendant, SAMANTHA BRUCATO-LANSDALE, and her counsel, together stipulate that the government would prove the following facts with admissible and credible evidence.

1. On or about November 22, 2019, the defendant babysat for N.K. aboard Marine Corps Base Quantico. While babysitting for N.K., the defendant obtained N.K.'s credit card numbers from N.K.'s possession, custody, and control with the intent to use N.K.'s credit card numbers and without the consent of N.K., the cardholder.
2. In and around this same time period, while aboard Marine Corps Base Quantico, within the Eastern District of Virginia, the defendant used N.K.'s credit card numbers to obtain goods, services, and things of value from online merchants by representing, without N.K.'s consent, that she was the authorized holder of N.K.'s credit card number.
3. In and around May 2020, the defendant was neighbors with A.B. at a residence aboard Marine Corps Base Quantico, within the Eastern District of Virginia.

**GOVERNMENT
EXHIBIT**


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4. Around this time, the defendant obtained A.B.'s credit card number from the A.B.'s possession, custody, and control with the intent to use A.B.'s credit card number and without the consent of A.B., the cardholder.
5. Thereafter, the defendant used A.B.'s credit card number, while aboard Marine Corps Base Quantico, within the Eastern District of Virginia, to obtain goods, services, and things of value from online merchants by representing, without A.B.'s consent, that she was the authorized holder of A.B.'s credit card number.
6. The defendant made the following unauthorized purchases with A.B.'s card:
 - a. Jilly Bugs Boutique (\$77.91, later cancelled due to a fraud alert)
 - b. Canvas365.com (\$55.94)
 - c. Padcist.com (\$87.49)
 - d. VictoriaSecret.com (\$178.02)
 - e. Galactic Toys & Collectables (\$107.98)
7. Receipts and records of these purchases were found on the defendant's cell phone. Additionally, some of the items purchased in these transactions were found in the defendant's residence. In the online purchases, the defendant had listed herself at her residence as the purchaser, but used A.B.'s credit card number for payment.
8. On or about November 19, 2020, A.B. spoke with the defendant. During this conversation, the defendant admitted to possessing A.B.'s credit card information and purchasing items from online vendors without A.B.'s consent.

Date: October 25, 2021

Respectfully submitted,

Jessica D. Aber
United States Attorney


Whitney E.C. Minter
Counsel for Samantha Brucato-Landsdale

By: 

Colin Norton
Special Assistant United States Attorney
Marc J. Birnbaum
Assistant United State Attorney